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By: 
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**DECLARATION OF DANIEL J. SCHNEIDER IN SUPPORT OF MOTION
TO DISPLACE ROBERT B. LOWER AS ATTORNEY OF RECORD FOR
DEFENDANTS AND TO REMOVE HIM FROM THE DOCKET**

Daniel J. Schneider, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury as follows:

1. I am an attorney licensed to practice law before the United States District Court for the Eastern District of New York, am a Partner of the Firm of Farber Schneider (“FSF”) and have appeared as counsel to Defendants Erik Stiene and any other individual who may be deemed to be a defendant (“Defendant(s)”) in the above captioned matter.

2. Robert B. Lower (“Mr. Lower”) is an attorney licensed to practice law before this Court has filed a notice of appearance in this case and is presently listed as one of the attorneys of record for Defendant(s) in this Action.

3. This declaration is respectfully submitted in support of my application for an order for the displacement Mr. Lower as counsel of record for Defendant(s), and removing his appearance from the Docket, pursuant to Local Rule 1.4.

4. Mr. Lower’s representation in this case arose from his association with FSF, the law firm representing Defendant(s) in this case.

5. Mr. Lower has concluded his association with FSF, FSF will continue with the defense of Defendant(s), and since Mr. Lower’s association with FSF has concluded, he will not be participating in the defense of Defendant(s) going forward.

6. FSF has requested and/or inquired, on more than one occasion that Mr. Lower submit a motion to withdraw pursuant to Local Rule 1.4, but, to date, Mr. Lower has declined to do so.

7. Accordingly, it is respectfully requested that the Court grant the displacement of Mr. Lower, and remove his appearance from the Docket.

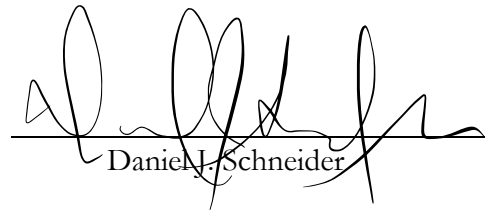
8. I am not aware of any basis for Mr. Lower to assert a retaining or charging lien nor has FSF received any demand of the kind from him.

9. FSF has communicated with Defendant(s) and this motion has been authorized as Defendant(s) indicate that FSF will continue the representation in this case.

10. I declare under penalty of perjury that the foregoing is true and correct.

WHEREFORE, based upon the foregoing, we respectfully request the Court grant FSF's motion to displace in its entirety, with such other and further relief as the Court deems appropriate.

Dated: New York, New York
February 29, 2024



Daniel M. Schneider